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4 FOR DEFENDANT WEI CHAN GONG
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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 UNITED STATES		}	Case No.: 18-CR-335 (20) AB	
	Plaintiff(s),		}	STATUS CONFERENCE
10 vs.				AFFIDAVIT L. STEVEN
				GOLDBLATT
12 WEICHAN GONG		}	DATE: APRIL 3, 2020	
	Defendant(s)		TIME: 9:00AM	
			COURTROOM 5 (b)	

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19 **AFFIDAVIT OF L. STEVEN GOLDBLATT**

20 I, L. Steven Goldblatt am admitted to all state and federal courts in the State of
21 California and set forth the following facts based upon personal knowledge:
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23 1. I represented Mr. Gong until I was fired without notice, on December 23,2020.
24 Due to the fact that Mr. Jonathan Rappel accepted substitution as counsel of record in
25 this matter, People v. Bei Yin (San Mateo County Superior Court) and People v.
26 Deng (San Mateo County Superior Court), and United States v. Lin (United States
27 District Court Southern District of California; I signed the Gong Substitution so that
28 Mr. Rappel would take over representation.

1 2. Now I know that Ms. Demidchick was less than candid with me and each of these
2 clients and the respective courts.

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4 3. Mr. Gong was my client starting the day I was hired by the firm July 22, 2019 until
5 y Bei Yin was abandoned by Demidchick Law Firm after I was terminated with no
6 cause an no notice on purported grounds that the Firm was closing its SF office Mr.
7 Jonathan told me he was going to substitute in my place for Gong, I just learned that
8 Mr. Jonathan left firm om when Carly Palmer advised me 14 days ago that there was
9 no activity on Mr. Gong's behalf and that I remained attorney of record.

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11 4. On 3 trips to Los Angeles July 17, 2019- July 30, 2019 and August 15 -August
12 21 and September 11, 12, and 13 I spent over a hundred hours reviewing 3 physical
13 CD roms with the discovery produced by the US, 24 hours meeting with Mr. Gong
14 and "Sophia" then a UC Davis Law School graduate working as an interpreter and
15 paralegal for Demidchick.

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17 5. Mr. Gong and I reviewed the Applicable 9th Cir. Case authority, the Ninth Circuit
18 Instructions, and the USSG guidelines and based on the offense and the \$490,000
19 seized by US agents from his premises in Chicago by means of warranted this client.
20 There were ongoing discussions of a confidential nature Mr. Gong was advised he
21 faced 53-62 months preliminarily that I advised him to proceed by means of a written
22 Proffer.

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24 6. I caused to be sent to Ms. Palmer shortly before Christmas a written proffer even
25 though we had no Proffer Letter, I feel thus would at least cause the US Attorney to
26 examine his case. That Proffer Letter was prepared by me based upon 8 hours of
27 discussions with Mr. Gong and "Sophia" the paralegal interpreter
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1 6. After being contacted by Ms. Palmer the following Monday got ahold of Leo the
2 Pre-Trial Officer in Northern District, I called Probation NDILL and CDCA as well
3 as the CASA officer in CDCA to find out what I needed to prepare to advance Mr.
4 Gong's case, a Proposed Pretrial Diversion Order based on Judge Biron's
5 participation in program. I was about to send same to US. I was advised by Bradley
6 Benedetto to as Walsh and Demidchick claimed right to appear on his behalf. Mr.
7 Benedetto continues to communicate with them and appears to back their request for
8 a telcon. We have an order for a Status Conference, and it should not be vacated.

9
10 7. Mr. Gong has no prior felonies. His lack of English-speaking capability and lack of
11 verifiable employment are serious issue impacting Mr. Gong ability to move forward
12 as a law-abiding and productive. individua. I am advising him that if he would agree
13 to an 18-month program where he would learn English and obtain verifiable
14 employment, then I could ask US Attorney to agree to such an agreement which Mr.
15 Gong qualifies for.

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17 8. Mr. Gong and his is companion were quite clear in. their directions to me. Mr.
18 Gong wanted to do everything possible to avoid serving a term pf imprisonment in
19 BOP.

20 9. Finally, I met with Weicheng Gong on September 11, 12 and 13 at the Demidchick
21 office and I know neither prior counsel discussed charges, elements of the offense,
22 USSG Guidelines and prepare a letter. Gong told me counsel had done nothing until
23 this meeting.

24 10. I am qualified to represent Mr. gong having litigated 37 case from complaint to
25 trial or plea as a CJA appointed by US District Court Eastern District of Missouri and
26 Southern District of Illinois.

1 11. There is a conflict of interest between Gong and another Demidchick Chicago
2 client and patent conflicts of interest between Gong and Demidchick that I cannot
3 offer any facts without inquiry by the Court.

4 12. BASED UPON THE FOREGOING, I WISH TO CONTINUE TO REPRESENT
5 MR. GONG AND I NEED HIS ELECTRONIC FILE AND PAPER FILE FROM
6 DEMIDCHICK AND UNFETTERED TELEPHONE ACCESS TO HIM WITH MY
7 MANDARIN INTERPRETER.

8 Executed under penalty of perjury this 18 day of March 2020

9 Ss

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Steven Goldblatt CBN 90674

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14 CERTIFICATE OF SERVICE

15 The foregoing Affidavit of L. Steven Goldblatt Re: Status Conference was served by
16 means of an operating CM-ECF NEXT GENERATION filing system on all counsel
17 of record via electronic service.

18 S/S Dated March 18, 2020
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